

1 **DORIS NEHME-TOMALKA, ESQ.**
2 Nevada Bar No. 6431
3 **NEHME-TOMALKA AND ASSOCIATES**
4 2620 Regatta Drive, Suite 102
5 Las Vegas, Nevada 89128
6 Telephone: 702-240-5280
7 Facsimile: 702-240-5380
8 Email: doris@nehme-tomalka.com
9 *Attorney for Defendants CHRISTA DOWNES*
10 *fka CHRISTA SHEDD and*
11 *BRADLEY RANDALL*

8 **UNITED STATES DISTRICT COURT**
9 **FOR THE DISTRICT OF NEVADA**

10 METROPOLITAN LIFE INSURANCE
11 COMPANY,

12 Plaintiff,

13 v.

14 DAVID M. DOWNES, DANIEL R.
15 DOWNES, COLLEEN P. DOWNES,
16 KAREN A. MACAULAY, BRADLEY
17 RANDALL, CHRISTA D. SHEDD,

Defendants.

Case No. 2:22-CV-00894-MMD-BNW

**STIPULATION TO EXTEND TIME
FOR DEFENDANT CHRISTA D.
SHEDD TO COMPLETE DEFENDANT
KAREN A. MACAULAY'S
DEPOSITION**

[FIRST REQUEST]

18 IT IS HEREBY STIPULATED by and between the parties hereto through their respective
19 attorneys that Defendant Christa D. Shedd *nka* Christa Downes may have additional time, up to and
20 including thirty (30) days after this Court renders an Order on Defendant Karen Macaulay's pending
21 Motion for a Protective Order [Doc. 38] within which to complete Defendant Karen Macaulay's
22 deposition. Presently, Defendant Karen Macaulay's Motion for a Protective Order is scheduled to be
23 heard by this Court on September 26, 2023.

24 The Parties held a meet and confer on July 10, 2023. Per the Court's Minute Order issued on July
25 3, 2023, this Stipulation is being submitted within fourteen (14) days of when the Parties met and
26 conferred.

27 This document is being electronically filed through the Court's ECF System. In this regard,

1 counsel for Defendant Christa D. Shedd nka Christa Downes attests that (1) the content of this
2 document is acceptable to all persons required to sign the document; (2) Counsel for Defendants David
3 M. Downes, Daniel R. Downes, Colleen P. Downes, and Karen A. Macaulay Plaintiff's counsel has
4 concurred with the filing of this document; and (3) a record supporting this concurrence is available
5 for inspection or production if so ordered.
6

7 DATED this 24th day of July, 2023.

8 CLARK MCCOURT

9 /s/ Brian Clark
10 Brian P. Clark (Nevada Bar No. 4236)
11 7371 Prairie Falcon Road, Suite 120
12 Las Vegas, NV 89128
13 *Attorneys for Defendants David R. Downes,
Daniel Downes, Colleen P. Downes, and
Karen A. Macaulay*

14 DATED this 24th day of July, 2023.

15 NEHME-TOMALKA AND ASSOCIATES

16 /s/ Doris Nehme-Tomalka
17 Doris Nehme-Tomalka (Nevada Bar No. 6431)
18 2620 Regatta Drive, Suite 102
19 Las Vegas, NV 89128
20 *Attorney for Defendant
Christa Downes aka Christa Shedd and
Bradley Randall*

21 **ORDER**
22 **IT IS SO ORDERED**

23 **DATED: 9:54 pm, July 25, 2023**

24 
25

26 **BRENDA WEKSLER**
27 **UNITED STATES MAGISTRATE JUDGE**
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